

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
*Plaintiff,*

v.

TORIN J. FINVER,  
*Defendant.*

**NOTICE OF MOTION  
TO FILE UNDER SEAL**

**CASE NO. 18-mj-05282-MJR**

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STATE OF NEW YORK     )  
COUNTY OF ERIE        ) ss:  
CITY OF BUFFALO        )

BARRY NELSON COVERT, ESQ., being duly sworn, deposes and says:

1. I represent the defendant Torin Finver.
2. Your deponent requests that the defendant's Response to the Government's Notice of Motion and Motion for Bail Revocation be filed under seal because the information set forth therein deals with issues in the case that should not be made available to the public.

WHEREFORE, your deponent prays that this Court rule accordingly.

DATED: Buffalo, New York  
November 15, 2019

Respectfully submitted,

/s/Barry Nelson Covert, Esq.  
BARRY NELSON COVERT, ESQ.  
LIPSITZ GREEN SCIME CAMBRIA LLP  
Attorneys for Defendant  
TORIN FINVER  
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42 Delaware Avenue, Suite 120  
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bcovert@lglaw.com

Subscribed and sworn to before me this  
15<sup>th</sup> day of November, 2019

/s/Kristina Drewery  
Commissioner of Deeds, Qualified in Erie County  
My Commission Expires December 31, 2020

TO: JOSHUA A. VIOLANTI, ESQ.  
ASSISTANT UNITED STATES ATTORNEY  
Federal Centre  
138 Delaware Avenue  
Buffalo, New York 14202